

THE GOUGH LAW FIRM, LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, Individually and on	:	
behalf of all others similarly situated,	:	Civil No. 3:18-CV-02293(FLW)(TJB)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
RIOT BLOCKCHAIN, INC. F/K/A,	:	
BIOPTIX, INC., JOHN O'ROURKE, and	:	
JEFFREY G. MCGONEGAL,	:	
	:	
Defendants.	:	

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Pao Kue ("Movant"), by and through her counsel, will and does hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for the entry of an Order: (1) appointing Movant as Lead Plaintiff on behalf of a class of all persons who purchased or acquired publicly traded securities of Riot Blockchain, Inc. f/k/a Bioptix, Inc. from November 13, 2017 through February 15, 2018, both dates inclusive; (2) approving Lead Plaintiff's selection of Milberg Tadler Phillips Grossman LLP and Gibbs Law Group LLP as Lead Counsel and The Gough Law Firm, LLP as Liaison Counsel for the Class; and (3) granting such other and further relief as the Court may deem just and proper.

Movant bases this motion on his supporting Memorandum of Law, the Declaration of Deborah R. Gough and exhibits attached thereto, the proposed form Order, and such other written or oral arguments as may be presented to the Court.

DATED: April 18, 2018

THE GOUGH LAW FIRM, LLP

/s/ Deborah R. Gough

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